

1 PAUL B. SALVATY (State Bar No. 171507)
PSalvaty@winston.com
2 WINSTON & STRAWN LLP
3 333 S. Grand Ave., 38th Fl.
4 Los Angeles, CA 90071-1543
Telephone: (213) 615-1700
Facsimile: (213) 615-1750

5 ABBE DAVID LOWELL (*pro hac vice* forthcoming)
AbbeLowellPublicOutreach@winston.com
6 WINSTON & STRAWN LLP
1901 L St., N.W.
7 Washington, D.C. 20036-3508
Telephone: (202) 282-5000
8 Facsimile: (202) 282-5100

9 Bryan M. Sullivan, State Bar Number 209743
bsullivan@earlysullivan.com
10 Zachary C. Hansen, State Bar Number 325128
zhansen@earlysullivan.com
11 EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP
12 6420 Wilshire Boulevard, 17th Floor
Los Angeles, California 90048
13 Telephone: (323) 301-4660
Facsimile: (323) 301-4676

11 Attorneys for PLAINTIFF
15 ROBERT HUNTER BIDEN

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

19 ROBERT HUNTER BIDEN, an individual.

Plaintiff,

VS.

"PATRICK M. BYRNE, an individual,

Defendant

Case No. 2:23-cv-09430-SVW-PD

**DECLARATION OF ZACHARY C.
HANSEN IN SUPPORT OF
PLAINTIFF ROBERT HUNTER
BIDEN'S *EX PARTE*
APPLICATION TO SEAL THE
JOINT STATEMENT OF
UNRESOLVED DISCOVERY
ISSUES AND EXHIBITS 1-6 & A-L
(DKT. # 76 THROUGH 76-18) AND
REPLACE WITH REDACTED
VERSIONS**

Filed concurrently with Ex Parte Application and [Proposed] Order

Date: October 4, 2024
Time: 9:00 AM



1 Ctrm.: 580
2 Judge: Hon. Patricia A. Donahue,
3 Ctrm. 580
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DECLARATION OF ZACHARY C. HANSEN

I, Zachary C. Hansen, declare and state as follows:

3 1. I am an Associate within the law firm of Early Sullivan Wright Gizer &
4 McRae LLP, attorneys of record for PLAINTIFF ROBERT HUNTER BIDEN herein.
5 I submit this declaration in support of Plaintiff's Ex Parte Application. If called as a
6 witness, I would and could testify to the matters contained herein.

7 2. Pursuant to Central District Local Rule 7-19.1 I made a reasonable, good
8 faith effort to advise counsel for Defendant Patrick Byrne (“Defendant”) of the date
9 and substance of the instant Application on October 2, 2024. On October 3, 2024,
10 Defendant’s counsel informed me that Defendant would join in the requested relief
11 sought by the instant *ex parte* application.

12 3. Defendant's counsel marked Exhibit L "Highly Confidential and to be
13 Filed Under Seal" (Dkt. # 76-18) because, according to Defendant's counsel, it
14 contains information relating to Defendant's location, which is highly sensitive
15 information because Defendant claims his life is at risk. Furthermore, references were
16 made to Defendant's location in the Statement and in the other various Exhibits
17 thereto.

18 4. Due to confusion on my part, the Statement, including Exhibit L, were
19 inadvertently filed in unredacted form.

20 5. A true and correct copy of the redaction version of the Joint Statement
21 of Unresolved Discovery Issues, originally filed as an unredacted version at Docket
22 No. 76, is attached hereto as **Exhibit A**.

23 6. A true and correct copy of the redaction version of the “Exhibit 1” to the
24 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
25 version at Docket No. 76-1, is attached hereto as **Exhibit B**.

26 7. A true and correct copy of the redaction version of the “Exhibit 2” to the
27 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
28 version at Docket No. 76-2, is attached hereto as **Exhibit C**.

1 8. A true and correct copy of the redaction version of the “Exhibit 3” to the
2 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
3 version at Docket No. 76-3, is attached hereto as **Exhibit D**.

4 9. A true and correct copy of the redaction version of the “Exhibit 4” to the
5 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
6 version at Docket No. 76-4, is attached hereto as **Exhibit E**.

7 10. A true and correct copy of the redaction version of the “Exhibit 5” to the
8 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
9 version at Docket No. 76-5, is attached hereto as **Exhibit F**.

10 11. A true and correct copy of the redaction version of the “Exhibit 6” to the
11 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
12 version at Docket No. 76-6, is attached hereto as **Exhibit G**.

13 12. A true and correct copy of the redaction version of the “Exhibit A” to the
14 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
15 version at Docket No. 76-7, is attached hereto as **Exhibit H**.

16 13. A true and correct copy of the redaction version of the “Exhibit B” to the
17 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
18 version at Docket No. 76-8, is attached hereto as **Exhibit I**.

19 14. A true and correct copy of the redaction version of the “Exhibit C” to the
20 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
21 version at Docket No. 76-9, is attached hereto as **Exhibit J**.

22 15. A true and correct copy of the redaction version of the “Exhibit D” to the
23 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
24 version at Docket No. 76-10, is attached hereto as **Exhibit K**.

25 16. A true and correct copy of the redaction version of the “Exhibit E” to the
26 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
27 version at Docket No. 76-11, is attached hereto as **Exhibit L**.

28 17. A true and correct copy of the redaction version of the “Exhibit F” to the

1 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
2 version at Docket No. 76-12, is attached hereto as **Exhibit M**.

3 18. A true and correct copy of the redaction version of the “Exhibit G” to the
4 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
5 version at Docket No. 76-13, is attached hereto as **Exhibit N**.

6 19. A true and correct copy of the redaction version of the “Exhibit H” to the
7 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
8 version at Docket No. 76-14, is attached hereto as **Exhibit O**.

9 20. A true and correct copy of the redaction version of the “Exhibit I” to the
10 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
11 version at Docket No. 76-15, is attached hereto as **Exhibit P**.

12 21. A true and correct copy of the redaction version of the “Exhibit J” to the
13 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
14 version at Docket No. 76-16, is attached hereto as **Exhibit Q**.

15 22. A true and correct copy of the redaction version of the “Exhibit K” to the
16 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
17 version at Docket No. 76-17, is attached hereto as **Exhibit R**.

18 23. A true and correct copy of the redaction version of the “Exhibit L” to the
19 Joint Statement of Unresolved Discovery Issues, originally filed as an unredacted
20 version at Docket No. 76-18, is attached hereto as **Exhibit S**.

21 I declare under penalty of perjury under the laws of the United States of
22 America that the foregoing is true and correct. Executed on this 3rd day of October,
23 2024, at Los Angeles, California.

/s/ Zachary C. Hansen

Zachary C. Hansen